

REPLY DEADLINE: July 11, 2012 at 5:00 p.m. (Eastern Time)

APPALOOSA INVESTMENT LIMITED
PARTNERSHIP I; PALOMINO FUND LTD;
THOROUGHbred FUND LP; THOROUGHbred
MASTER LTD; THE LIVERPOOL LIMITED
PARTNERSHIP; ELLIOTT INTERNATIONAL LP;
DRAWBRIDGE DSO SECURITIES LLC;
DRAWBRIDGE OSO SECURITIES LLC; FCOF UB
SECURITIES LLC; AURELIUS INVESTMENT, LLC;
CITIGROUP GLOBAL MARKETS INC.; LMA SPC
FOR AND ON BEHALF OF THE MAP 84
SEGREGATED; KNIGHTHEAD MASTER FUND,
L.P.; KIVU INVESTMENT FUND LIMITED; CQS
DIRECTIONAL OPPORTUNITIES MASTER FUND
LIMITED; MORGAN STANLEY & CO.
INTERNATIONAL PLC; SG AURORA MASTER
FUND L.P.; THE CANYON VALUE REALIZATION

FUND (CAYMAN), LTD; ANCHORAGE CAPITAL :
MASTER OFFSHORE LTD; ONEX DEBT :
OPPORTUNITY FUND, LTD; REDWOOD MASTER :
FUND LTD; COLLINS STEWART (CI) LTD; SPH :
INVEST SA; CONSILIUM TREUHAND AG & BEATA :
DOMUS ANSTALT; MARIA-DOROTHEA LAMINET; :
CREDIT SUISSE AG; CHEVIOT ASSET :
MANAGEMENT; ING. HUGO WAGNER; ALLIANZ :
BANK FINANCIAL ADVISORS SPA; RUI MANUEL :
ANTUNES GONCALVES ROSA; UBS AG, ZURICH :
(SWITZERLAND); ALY AZIZ; JOHANNA :
SCHOEFFEL; SIRDAR ALY AZIZ; CSS, LLC; JOSEF :
SCHMIDSEDER; HERMANN DETTMAR AND :
HELENE DETTMAR; CLAUS PEDERSEN; HFR RVA :
ADVENT GLOBAL OPPORTUNITY MASTER :
TRUST; THE ADVENT GLOBAL OPPORTUNITY :
MASTER FUND; BANCA DELLE MARCHE SPA; :
ORE HILL CREDIT HUB FUND LTD; BHALODIA :
RV/RM/PATEL RG; BARCLAYS BANK PLC; :
JPMORGAN SECURITIES LIMITED; INTESA :
SANPAOLO SPA; INTESA SANPAOLO PRIVATE :
BANKING SPA; CREDITO EMILIANO SPA; :
UNICREDIT BANCA DI ROMA SPA; HUTCHIN :
HILL CAPITAL C1, LTD.; DEUTSCHE BANK SPA; :
BANCA POPOLARE DI VICENZA SCPA; CASSA :
CENTRALE BANCA-CREDITO COOPERATIVO DEL :
NORD EST SPA; BANCA DI CREDITO :
COOPERATIVO DI ROMA SOCIETA :
COOPERATIVA; BANK OF VALLETTA PLC; :
BANCA DI CREDITO COOPERATIVO ABRUZZESE- :
CAPPELLE SUL TAVO-SOCIETA COOPERTIVA; :
UBS AG; PERA UGO; GARIBALDI ROSANNA; :
CANYON VALUE REALIZATION FUND LP; :
LYXOR/CANYON VALUE REALIZATION FUND :
LIMITED; CANYON-GRF MASTER FUND LP; :
PROSPECT MOUNTAIN FUND LIMITED; RED :
RIVER BUSINESS INC.; GREEN HUNT WEDLAKE, :
INC., as trustee for General Motors Nova Scotia Finance :
Company; JOHN DOE NOS. 1-100; and JOHN DOE, :
INC. NOS. 1-100, :
Defendants. :
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**GUC TRUST’S MEMORANDUM OF LAW IN OPPOSITION TO
SUMMARY JUDGMENT MOTION FILED BY GENERAL MOTORS LLC**

CONTENTS OF DOCUMENT FILED UNDER SEAL PURSUANT TO PARAGRAPH 4 OF THE
PROTECTIVE ORDER, SO ORDERED ON APRIL 7, 2011 [DOCKET NO. 10059]